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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

STATE OF CALIFORNIA and GAVIN	)	Case No. 3:25-cv-03372-JSC
NEWSOM, in his official capacity as Governor	)	
of California,	)	<b>DECLARATION OF LUKE MATHERS IN</b>
	)	<b>SUPPORT OF DEFENDANTS'</b>
Plaintiffs,	)	<b>ADMINISTRATIVE MOTION FOR LEAVE TO</b>
	)	<b>FILE SUPPLEMENTAL BRIEF</b>
v.	)	
	)	
DONALD J. TRUMP, et al.,	)	
	)	
Defendants.	)	

1. I am a Trial Attorney in the U.S. Department of Justice, Civil Division, Commercial Litigation Branch, International Trade Field Office, in New York, New York. I am one of the attorneys responsible for representing defendants in the above-captioned case. This declaration is based on

1 personal knowledge that I obtained in the performance of my official duties.

2       2. This declaration is submitted pursuant to Civil Local Rule 7-11(a), to explain why a  
3 stipulation could not be obtained from plaintiffs State of California and Gavin Newsom to provide the  
4 relief requested in defendants' administrative motion for leave to file a supplemental brief.

5       3. On May 29, 2025, I emailed counsel for plaintiffs asking whether plaintiffs would  
6 stipulate to the relief requested in defendants' administrative motion.

7       4. On May 29, 2025, counsel for plaintiffs responded that they would stipulate only if  
8 defendants stipulated in advance that plaintiffs could file a response.

9       5. On May 29, 2025, I emailed counsel for plaintiffs asking whether plaintiffs would instead  
10 not oppose the relief requested in defendants' administrative motion.

11       6. On May 29, 2025, counsel for plaintiffs responded that they were willing to not oppose  
12 defendants' administrative motion only if defendants agreed in advance to not oppose a future  
13 administrative motion by plaintiffs to file a response; otherwise, plaintiffs reserved their rights to oppose  
14 defendants' administrative motion.

15       Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
16 correct.

17 Dated this 30th day of May, 2025.

s/Luke Mathers

LUKE MATHERS

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